

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JULIA M. MATOESIAN,)	
)	
Plaintiff,)	
)	
v.)	No. 3:15 – cv – 164 DGW
)	
MADISON COUNTY STATES)	
ATTORNEY’S OFFICE, and)	
MADISON COUNTY GOVERNMENT,)	
)	
Defendants.)	

PLAINTIFF’S RESPONSE TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT

Plaintiff Julia Matoesian was 75 years old at the time defendants terminated her employment and plaintiff was replaced by a substantially younger employee. Defendants terminated plaintiff’s employment by first informing plaintiff’s husband. Both of these facts together with other matters gave plaintiff a good faith basis to believe that plaintiff’s age was a factor in defendants’ decision to terminate her employment.

Given the “but for” standard imposed by the Supreme Court and as applied by the Seventh Circuit plaintiff confesses the defendants’ motion for summary judgment.

Respectfully Submitted,

Plaintiff, Julia M. Matoesian,

By, her attorney,

s/ Lee W. Barron

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CERTIFICATE OF SERVICE

The Undersigned hereby certifies that a true and correct copy of the foregoing document was transmitted by email and also deposited in the US Mail on August 26, 2017, postage prepaid and properly addressed to all known counsel of record as follows:

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